

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUAN R. VICENTE,
JUAN ZAMORA and
LUIS BENITEZ,
*on behalf of themselves, FLSA Collective
Plaintiffs and the Class,*

Plaintiffs,

v.

LJUBICA CONTRACTORS LLC and
PREDRAG JANKOVIC,

Defendants.

Case No. 18-CV-419

**NOTICE OF PLAINTIFFS' MOTION
FOR SUMMARY JUDGMENT**

Please take notice that Plaintiffs JUAN R. VICENTE, JUAN ZAMORA and LUIS BENITEZ (together, the "Plaintiffs"), by the undersigned attorneys, hereby move under Rule 56 of the Federal Rules of Civil Procedure for summary judgment as described in the proposed Order attached hereto. In support of this motion, Plaintiffs respectfully submit the accompanying Memorandum of Law, Declaration of C.K. Lee and exhibits annexed thereto, and Local Rule 56.1 Statement.

Dated: New York, New York
June 28, 2019

Respectfully submitted,
LEE LITIGATION GROUP, PLLC

By: /s/ C.K. Lee
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